

UNITED STATES

v.

MANNING, Bradley E., PFC

U.S. Army, (b) (6)

Headquarters and Headquarters Company, U.S.

Army Garrison, Joint Base Myer-Henderson Hall,

Fort Myer, VA 22211

**DEFENSE WITNESS LIST FOR
MERITS AND SENTENCING**

DATED: 15 October 2012

1. On behalf of PFC Bradley E. Manning, his civilian counsel, David E. Coombs, requests the attendance of each of the following witnesses for merits and sentencing:

Merits Witnesses

1) (b) (6), (b) (7)(A), (b) (7)(B)

2) (b) (6), (b) (7)(A), (b) (7)(B)

(b) (6), (b) (7)(A) [Redacted text block]

3) (b) (6), (b) (7)(A) [Redacted text block]

4) (b) (6), (b) (7)(A) [Redacted text block] was the assistant
S-6 for the 2BCT. (b) (6), (b) (7)(A) [Redacted text block]

(b) (7)(A) [REDACTED]

- 5) (b) (6) [REDACTED] will testify concerning his expectations of the analysts that worked within the S-2 Section. Specifically, CW2 [REDACTED] will testify concerning the guidance that he provided

(b) (7)(A) [REDACTED]

6) (b) (6) (b) (7)(A)

7) (b) (6) (b) (7)(A)

8) (b) (6) He is a 35N – signal intelligence analyst. (b) (7)(B), (b) (7)(A)

SGT [redacted] will also testify that his main job was to document SIGACT reports for the battalion. SGT [redacted] will testify about the process for the development of a SIGACT and how the information went from the unit to ultimately within the CIDNE database.

9)(b) (6)

[REDACTED] will testify that at the time of the deployment she was a Specialist. SGT [REDACTED] will testify that she worked with PFC Manning. (b) (7)(A)

[illegible]

██████████ SGT ██████████ testimony will be used to rebut any testimony offered by the Government from Ms. (b) (6) ██████████

10) (b) (6)

██████████ SGT ██████ will testify about the work that she did along with PFC Manning during their time in the T-SCIF. (b) (7)(A)

11) _____

(b) [REDACTED]
(6) [REDACTED] SGT [REDACTED] will testify that

(b) [REDACTED] SGT [REDACTED] will testify that he was a fellow analyst working with PFC Manning. SGT [REDACTED] will testify that at the time of the deployment he was a Specialist. (b) (7)(A) [REDACTED]

[REDACTED]

(b) (7)(A)

12) (b) (6)

will testify as an intelligence analyst expert witness. Mr. [REDACTED] will testify that he conducted open source research on each of the charged SIGACTS in Specifications 5 and 7 of Charge II. (b) (7)(A)

Finally, Mr. [REDACTED] will testify about the other charged documents in Specifications 3, 10, and 15.

13) (b) (6)

Ms.

will testify that at the time of the deployment she was a Specialist. Ms. [REDACTED] will testify that shortly after the deployment she ETS'd from the Army.

(b) (7)(A)

14) Colonel (Retired) (b) (6)

will testify as an expert witness. Col. [REDACTED] will testify that he was appointed to serve as the Chief Prosecutor for the Office of Military Commissions in September of 2005. Col. [REDACTED] served as the Chief Prosecutor from then until October of 2007. As the former Chief Prosecutor, Col.

(b) (7)(A)

(b) (7)(A)

[Redacted text block]

- 15) Mr. (b) (6) Mr. [Redacted] will testify that he was a civilian contractor in Iraq assigned to work as the DCGS-A Field Software Engineer. Mr. [Redacted] will testify that he worked in this position from November 2007 to December of 2010. Mr. [Redacted] will testify that the only machines he worked on were the DCGS-A machines. (b) (7)(A)

[Redacted text block]

(b) (7)(A)

[REDACTED]

16) (b) (6)

[REDACTED] Mr. [REDACTED] will testify as an expert witness. Mr. [REDACTED] will testify about his inspection of hard drives provided to him from the Government. (b) (7)(A)

[REDACTED]

17) (b) (6)

[REDACTED] will testify that he had an instant messenger chat conversation with PFC Manning between 21 May and 26 May 2010. (b) (7)(A)

[REDACTED]

18) (b) (6)

[REDACTED] will discuss an instant messenger chat conversation that he had with PFC Manning over the course of six months in

2009. The conversation began on 21 February 2009 and ended on 11 August 2009.

(b) (7)(A)

[REDACTED]

- 19) (b) (6)
- [REDACTED] will testify as a security expert witness. Mr. [REDACTED] will testify that he conducted open source research on each of the charged diplomatic cables in Specification 13 of Charge II. (b) (7)(A)
- [REDACTED]

- 20) (b) (6)
- [REDACTED]
- [REDACTED] will testify as an expert witness concerning the history of the WikiLeaks organization and how it was viewed prior to the charged leaks. (b) (7)(A)
- [REDACTED]

(b) (7)(A) [REDACTED]

21) (b) (6) [REDACTED]
[REDACTED]
[REDACTED] will testify as an expert witness. Mr. [REDACTED] (b) (7)(A) [REDACTED], one of their responsibilities is put out rapid adaption information to the field. Mr. [REDACTED] will testify that rapid adaption is a process whereby information is analyzed and disseminated in a timely manner relative to the criticality of actions required for soldiers and leaders to adapt that information to current operations and DOTMLPF (doctrine, organization, training, material, leadership & education, personnel, and facilities) development. Mr. [REDACTED] will testify that rapid adaption is a process that is designed to save soldier's lives and improve the effectiveness and/or efficiency of Army operations. (b) (7)(A) [REDACTED]
[REDACTED]
[REDACTED]

Sentencing Witnesses

22) (b) (6) [REDACTED]
[REDACTED]
[REDACTED] (b) (7)(A) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(b) (7)(A) [REDACTED]

23) (b) (6) [REDACTED] CAPT
[REDACTED] will testify as an expert witness. (b) (6), (b) (7)(A) [REDACTED]

[REDACTED]

[REDACTED]

(b) (7)(A)

[REDACTED]

(b) (7)(A) [REDACTED]

25) (b) (6) [REDACTED] will testify that he had very little interaction with the S2 shop. MAJ [REDACTED] will testify about the guidance he gave regarding whether soldiers would deploy. (b) (7)(A) [REDACTED]

26) (b) (6) [REDACTED] will testify that he was the 2/10 BCT S-2 until being replaced by CPT [REDACTED] MAJ [REDACTED] (b) (7)(A) [REDACTED]

(b) (7)(A) [Redacted text block]

30) (b) (6) [Redacted text block]

31) (b) (6), (b) (7)(A) [Redacted text block]

(b) (7)(A) [REDACTED]
[REDACTED]
[REDACTED]

34) [REDACTED] (b) [REDACTED]
[REDACTED] (6), (b) (7)(A)
[REDACTED] (6)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

35) [REDACTED] (b) [REDACTED]
[REDACTED] (6) will testify that he was PFC
Manning's NCOIC. (b) (7)(A), (b) (6) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

36) [REDACTED] (b) [REDACTED]
[REDACTED] (6) will testify that he
originally did not have supervisory responsibilities at his unit. SGT [REDACTED] will
testify that after approximately 60 days, he was given responsibility for supervising
two subordinate 35F soldiers. SGT [REDACTED] will testify that one of these soldiers was
PFC Manning. SGT [REDACTED] will testify that when he got to the unit in May of 2009,
he (b) (7)(A) [REDACTED]
[REDACTED]
[REDACTED]

(b) (7)(A) [REDACTED]

37) (b) (6), (b) (7)(A) [REDACTED] will testify that she has known PFC Manning since 2008. (b) (6), (b) (7)(A) [REDACTED]

38) (b) (6), (b) (7)(A) [REDACTED] will testify that while in Iraq, he worked as an analyst on the day shift and PFC Manning worked as an analyst on the night shift. (b) (7)(A) [REDACTED]

(b) (6), (b) (7)(A)

_____ will testify that during the

deployment he was a Specialist. (b) (7)(A)

[REDACTED]

(b) (6), (b) (7)(A)

[REDACTED] (b) (7)(A)

(b) (6), (b) (7)(A)

(b) (6), (b) (7)(A)

(b) (7)(A) [Redacted text block]

- 42) (b) (6), (b) (7)(A) [Redacted text block]
- (b) (6) [Redacted text block]

(b) (7)(A) [Redacted text block]

43) (b) (6) [Redacted text block]
(b) (6), (b) (7)(A) [Redacted text block]

44) (b) (6), (b) (7)(A) [Redacted text block]
[Redacted text block] will testify as an expert for the defense in information assurance practices. (b) (7)(A) [Redacted text block]

45) (b) (6), (b) (7)(A) [Redacted text block]
[Redacted text block] (b) (7)(A) [Redacted text block]

(b) (7)(B), (b) (7)(A)

COL [REDACTED] will testify that his office is the Army representative to the Joint Intelligence Explosive Ordnance Disposal (EOD) Organization. COL [REDACTED] will testify that his organization has the following sub-tasks: (1) publish and maintain the Army CID OPSEC manual, (2) sustain funding for theater operations, (3) manage Army EOD, (4) Army staff lead for weapons technical knowledge, and (5) represent the Army at the Warfighter Senior Integration Group. COL [REDACTED] will testify that his organization uses intelligence information gathered from Army G2, DIA, unit operation/intelligence summaries, and any intelligence gathered by Provincial Reconstruction Teams. (b) (7)(A)

46) (b) (6), (b) (7)(A)

[REDACTED] will testify about PFC Manning's childhood and the difficulty that he experienced (b) (6), (b) (7)(A)

Finally, Ms. [REDACTED] will testify about PFC Manning's rehabilitative potential in society.

2. The Defense reserves the right to supplement this witness list with additional witnesses. Any supplemental witness list will be filed in a timely manner and based upon either a filing by the Government of additional witnesses or the discovery of additional information relevant to either merits or sentencing.

Respectfully submitted,

DAVID EDWARD COOMBS
Civilian Defense Counsel